

EXHIBIT A

Chris Wido

From: Matthew Pitts <mpitts@alliancesecurity.com>
Sent: Wednesday, February 21, 2018 9:06 AM
To: Chris Wido
Subject: Fwd: Sears et al v. Alliance Security, Inc. et al, 1:17-cv-00934-DAP
Attachments: Settlement Agreement Sears.Edwards - Alliance Edits.doc

Hello Chris,

Please find attached the settlement agreement with some minor edits and additions. Please let me know if you have any concerns with the edits.

Thanks.

Matt

Alliance Security



Matthew Pitts, Esq.
In-House Counsel
Tel.: 401-709-8927

[Alliance Security](#)

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| 85 Garfield Ave. |
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,
RI

02920
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----- Forwarded message -----

From: [Matthew Pitts <mpitts@alliancesecurity.com>](mailto:Matthew.Pitts@alliancesecurity.com)
Date: Mon, Feb 19, 2018 at 9:36 AM
Subject: Re: Sears et al v. Alliance Security, Inc. et al, 1:17-cv-00934-DAP
To: Chris Wido <Chris.Wido@spitzlawfirm.com>
Cc: "David A. Sullivan" <DSullivan@darroverett.com>

Chris,

I apologize for the delay on this. We have over the last month moved corporate offices. I will review immediately and will have it back to you in the next 24 hours.

Best,

Matt

On Sunday, February 18, 2018, Chris Wido <Chris.Wido@spitzlawfirm.com> wrote:

Matt and Dave,

It has been nearly a month since I sent you the draft agreement. Please advise on the status of this.

All the best,

Chris Wido

Chris P. Wido

THE SPITZ LAW FIRM, LLC

The Employee's Attorney.TM

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From: Chris Wido
Sent: Friday, January 19, 2018 4:43 PM
To: 'Matthew Pitts' <mpitts@alliancesecurity.com>
Cc: David A. Sullivan <DSullivan@darroweverett.com>
Subject: RE: Sears et al v. Alliance Security, Inc. et al, 1:17-cv-00934-DAP

Matthew,

Thank you for clarifying. I have attached a proposed settlement agreement. Please let me know if there are any issue with it.

All the best,

Chris Wido

Chris P. Wido

THE SPITZ LAW FIRM, LLC

The Employee's Attorney.TM

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From: Matthew Pitts [<mailto:mpitts@alliancesecurity.com>]
Sent: Friday, January 19, 2018 11:04 AM
To: Chris Wido <Chris.Wido@spitzlawfirm.com>
Cc: David A. Sullivan <DSullivan@darrovereverett.com>
Subject: Re: Sears et al v. Alliance Security, Inc. et al, 1:17-cv-00934-DAP

Hello Chris,

I believe that there was a misunderstanding. Yes, still intend to settle this as previously discussed. Please forward to me the allocations. In addition, I would appreciate it if you would also draft a settlement agreement for our review. With the continued efforts in the bankruptcy our resources are somewhat strained. We will, however, be able to promptly review the settlement agreement once drafted.

Sincerely,

Matt Pitts

Alliance Security



Matthew Pitts, Esq.

Director of Legal Compliance

Tel.: [401-709-8927](tel:401-709-8927)

[Alliance Security](#)

[Rhode Island](#)

[185 Garfield Ave.](#) |

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On Fri, Jan 19, 2018 at 10:23 AM, Chris Wido <Chris.Wido@spitzlawfirm.com> wrote:

David,

We never discussed who was to draft the settlement agreement, and the emails do not specify and/or are ambiguous. I apologize for not getting you allocations, which I assume led me to believe that you were in fact drafting. I will try to get you something today.

I am, however concerned by language that suggests that settlement is “possible.” We have an agreement, and the Court retains jurisdiction to enforce that agreement. Hopefully I am just misreading you.

All the best,

Chris Wido

Chris P. Wido

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From: David A. Sullivan [mailto:DSullivan@darroweverett.com]
Sent: Thursday, January 18, 2018 4:50 PM
To: Chris Wido <Chris.Wido@spitzlawfirm.com>
Cc: Matthew Pitts (mpitts@alliancesecurity.com) <mpitts@alliancesecurity.com>

Subject: RE: Sears et al v. Alliance Security, Inc. et al, 1:17-cv-00934-DAP

Attorney Wido,

My belief and understanding is that we settled this matter (especially since you contacted the court on 9/12 and reported to the court that the case had settled) and you stated that there was going to be a need for 3 checks to be written to each of your clients. I told you that I was awaiting your proposed breakdown for these three checks (settlement was \$5k each plaintiff total \$10k) and I was also awaiting your proposed settlement agreements (releases, stipulations of dismissal, etc.). I have never received any of this from you. Your email dated 1/4 is very confusing and in contradiction to the email exchange (which I have reviewed). I have looped Matt Pitts in on this email, he is the director of legal compliance at Alliance. Please feel free to deal directly with him. As far as I know, the case can still be settled, but as I stated earlier, we have been waiting for your allocation for these checks and your proposed settlement documents. Please review your email to me dated 9/17 @7:49 am, as well as my response to you on the same day (9/14) @8:54 am.

Thanks and good luck.

David A. Sullivan

Partner



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From: Chris Wido [<mailto:Chris.Wido@spitzlawfirm.com>]
Sent: Thursday, January 04, 2018 9:07 AM
To: David A. Sullivan
Cc: Chad Gottlieb
Subject: RE: Sears et al v. Alliance Security, Inc. et al, 1:17-cv-00934-DAP

David,

I am sure it is an oversight, but I have not heard from you since we resolved this case. Please advise when I can expect a draft settlement agreement. If I do not hear back from you by next Friday, (1/12), I will no choice but to file a motion to enforce. I look forward to hearing from you.

All the best,

Chris Wido

Chris P. Wido

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The Employee's Attorney.™

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From: David A. Sullivan [<mailto:DSullivan@darroweverett.com>]
Sent: Thursday, September 14, 2017 8:54 AM
To: Chris Wido <Chris.Wido@spitzlawfirm.com>
Cc: Chad Gottlieb <CGottlieb@darroweverett.com>
Subject: Re: Sears et al v. Alliance Security, Inc. et al, 1:17-cv-00934-DAP

Chris,

Thanks, I appreciate the effort and desire to settle these claims. We will also need releases from your clients running to the benefit of our clients. I have no idea how you propose to allocate each settlement to each plaintiff so before I can give the final approval I would need to see your proposed breakdown and the releases. I am assuming the proportional breakdown will be the same for both of your clients? If I am mistaken please give me a breakdown for both clients. I can't see how this could be a deal breaker but I would need to explain these breakdowns to my clients. I agree that we are at "common ground" here, but I need the breakdown(s) and we would need to approve the language of the release before we can set this in stone. Thanks again.

David A. Sullivan
Partner
DarrowEverett LLP

Rhode Island | Massachusetts | New York | Florida

On Sep 14, 2017, at 7:50 AM, Chris Wido <Chris.Wido@spitzlawfirm.com> wrote:

Marrissa,

I wanted to advise the Court that the parties have reached a settlement in principal. Thus, we can cancel the mediation.

All the best,

Chris Wido

From: Marissa.Black@ohnd.uscourts.gov <Marissa.Black@ohnd.uscourts.gov>
Sent: Tuesday, September 12, 2017 4:06 PM
To: Chris Wido
Subject: Re: Sears et al v. Alliance Security, Inc. et al, 1:17-cv-00934-DAP

Chris,

Thank you for your quick responses. I sent my last email to all parties' counsel so I will wait to hear back from Defendant's counsel.

Thanks,

Marissa

From: Chris Wido <Chris.Wido@spitzlawfirm.com>
To: "marissa_black@ohnd.uscourts.gov" <marissa_black@ohnd.uscourts.gov>;
Date: 09/12/2017 04:02 PM
Subject: Re: Sears et al v. Alliance Security, Inc. et al, 1:17-cv-00934-DAP

Marissa,

That is my understanding but you would probably have to ask him.

Chris Wido

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From: [Marissa Black@ohnd.uscourts.gov](mailto:Marissa_Black@ohnd.uscourts.gov) <[Marissa Black@ohnd.uscourts.gov](mailto:Marissa_Black@ohnd.uscourts.gov)>

Sent: Tuesday, September 12, 2017 4:00:38 PM

To: ekinder@spilmanlaw.com; glofstead@spilmanlaw.com

Cc: Chris Wido

Subject: Sears et al v. Alliance Security, Inc. et al, 1:17-cv-00934-DAP

Hello,

The Judge asked me to reach out to you to inquire whether counsel for Alliance Security, Inc. plans to represent Jasjit Gotra. Please let me know at your earliest convenience.

Thanks,

Marissa

Marissa Black
Law Clerk to The Honorable Dan Aaron Polster
U.S. District Court, Northern District of Ohio
[216.357.7194](tel:216.357.7194)

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